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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:

ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

**JOINT STATEMENT REGARDING
DOCUMENT ADMISSIBILITY AND
AUTHENTICATION**

Courtroom: 8, 4th Floor
Judge: The Honorable Lucy H. Koh

Pursuant to the Court's September 8, 2014 Case Management Order (Dkt. 986) requiring the parties to file a Joint Statement Regarding Business Record Disputes by 30 days prior to the pretrial conference, and pursuant to the parties' agreement to file the joint statement early, on November 17, 2014, the parties provide the following report.

The parties are meeting and conferring to substantially reduce the number of documents in dispute. Defendants Adobe Systems, Inc., Apple Inc., Google Inc., and Intel Corp. ("Defendants") have indicated their willingness to agree not to object on hearsay grounds to the vast majority of the documents produced by Defendants for which Plaintiffs have requested stipulations. Plaintiffs indicated their willingness to take this approach on April 15, 2014, and not object to the documents for which Defendants have requested stipulations. Until an agreement is finalized, the parties reserve their rights to object to documents for which other parties have requested stipulations, and Plaintiffs reserve their right to seek depositions regarding any documents as to which the parties cannot reach agreement.

Dated: November 17, 2014 LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP

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22 **ATTESTATION:** Pursuant to Civil Local Rule 5-1(i)(3), the filer attests that concurrence in the
23 filing of this document has been obtained from all signatories.